

**APPLICANT ARGUMENTS OR REMARKS**

Claims 1-20 are now in the application. Claims 1, 6,7 and 11 are amended. Claims 1 and 11 are independent claims.

**Specification**

The Office Action rejects the title for not being descriptive. Applicant has amended the title to: “Response generator for mimicking human-computer natural language conversation”.

Applicants submit that the amended title is clearly indicative of the claimed invention and, therefore, requests that this rejection be withdrawn, and the application allowed.

The Office Action alleges the use of the trademark “Pokemon”, misspelled as “Pokeman”, citing col. 28, line 16.

Applicants respectfully submit that the specification as filed contains no reference to either Pokeman or Pokeman. Furthermore, the application as filed contains no column 28.

Applicants respectfully note that Strubbe (U.S. Patent 6,721,706) that is cited against applicant does, however, contain a reference to Pokeman on column 28, line 16.

Applicants respectfully submit that the Office Action’s rejections of the specification regarding the use of “Pokeman” are mistaken and therefore requests that this rejection be withdrawn and applicants’ application allowed to issue.

**Claim Rejection under 35 U.S.C. 112**

The Office Action rejects claims 6 and 7 under 35 U.S.C. 112, second paragraph. In particular, the Office Action rejects the limitation “said generating a response to a natural language query” as lacking antecedent basis.

Applicant has amended claims 6 and 7 to now read, in relevant part: ““said autonomously generating a response to a natural language query””.

Applicant submits that by this amendment, claims 6 and 7 are now in compliance with 35 USC 112, second paragraph. Applicant therefore requests that this rejection be withdrawn and claims 6 and 7 allowed.

**Claim Rejections under 35 U.S.C. 103(a)**

The Office Action rejects claims 1, 6, 7, 8, 10, 11, 16, 17 18 and 20 as obvious over Strubbe (U.S. Patent 6,721,706) in view of Karaali (U.S. Patent 6,182,028).

Strubbe teaches an interaction simulator, such as a chatbot, enabled to simulate an awareness of the user to generate an interaction that is more natural and appropriate than prior chatterbots. For example, the device may employ machine vision to detect the number of people present. (Abstract).

The Office Action admits, however, that Strubbe does not disclose a context database.

Karaali teaches a method, system and device for disambiguation of parts of speech of a sentence that combines processing of both local and expanded context (col. 2, line 14-17). In particular, Karaali teaches a method that disambiguates the part-of-speech tags of text tokens by obtaining a set of probabilistically annotated tags for each text token, determining a locally predicted tag from each text token based on the local context of the text token, determining an alternative tag for each text token based on the expanded context of the text token and choosing between the locally predicted tag and the alternative tag when the locally predicted tag are different.

The Office Action alleges that Karaali's "tag content knowledge database" is equivalent to applicants' claimed context database.

Karaali's local context is essentially the probability that a token (a.k.a. a word) is a particular tag (a.k.a. a part of speech) depending on the token it precedes or it is preceded by. This probability is determined by corpus analysis, i.e., by the examination of a selected body of text material. (col. 5, lines 1-10). Karaali's "tag content knowledge database" is, therefore, a database containing tokens and the probabilities they take a particular tag as a function of the tokens that occur before and after them in a sentence.

Applicants' claimed invention, in contrast, contains a context database that contains local elements such as time, date and location as well as real world elements such as results of sporting events, the status of stock market indices, etc. [0047]. These context elements are used in formulating the response selected from the statement-response database. [0050].

For example, as detailed in [0050], the question-response database may have statements that include an optimism index that is some combination of how close the expected temperature at the location associated with those statements was to the actual temperature on the day the database was updated with those statements. Other examples of

factors that may be factored into the optimism index associated with the statement are how much the DOW index rose the day before, and the outcome of the most recent local team sport. When responding to a query, the response engine first obtains data from the context database to formulate an optimism index for today, the day of the query, and uses this to select a response that, in addition to being a response to a statement, has an associated optimism index that most closely matches today's optimism index.

In order to further clarify this distinction and to more clearly distinguish applicant's claimed invention from the prior art, applicant has amended claims 1 and 11 to read, in relevant part:

autonomously generating a natural language response to a received natural language input, wherein said generating a response comprises following a conversation strategy, choosing at least one context element from a context database and searching said updated statement-response database using said at least one context element to select a response.

Kaarali's equivalent of a context element is a probability that a particular word (token) is a particular part of speech (tag). Neither Kaarali or Stubbe teach or suggest how such a probability can be used in searching a statement-response database to select a response. As neither Stubbe or Kaarali teach or suggest a context database containing context elements that may be used as part of searching an updated statement-response database to select a response, they do not anticipate or render applicants' claimed invention obvious.

Applicants, therefore, request that the rejection be withdrawn and claims 1 and 11 be allowed.

As claims 2-10 and 12 – 20 depend from, and include all the limitations of, allowable independent claims, they too are in condition for allowance. Applicants, therefore request that all the claim rejections be withdrawn and claims 2-10 and 12 – 20 be allowed.

**Summary**

Therefore in view of the foregoing amendments and remarks, applicants respectfully request entry of the amendments, favorable reconsideration of the application, withdrawal of all rejections and objections and that claims 1-20 be allowed at an early date and the patent allowed to issue.

Respectfully submitted,

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